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26 **Pro hac vice application forthcoming*

27 *Attorneys for Defendant*
28 *MGM Resorts International*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

20 DAVID TEREZO, individually and on behalf of
21 all others similarly situated

22 Plaintiff,

23 v.

24 MGM RESORTS INTERNATIONAL,

25 Defendant.

Case No. 2:23-cv-01577-JAD-VCF

**STIPULATION TO EXTEND TIME
TO FILE DEFENDANT'S
RESPONSE TO COMPLAINT
(FIRST REQUEST)**

27 Pursuant to LR IA 6-1, Plaintiff David Terezo and Defendant MGM Resorts
28 International ("MGM") (collectively, the "Parties") respectfully stipulate MGM's time to

1 respond to the Complaint be extended from the current deadline of November 20, 2023 to
 2 and including December 12, 2023. This is the first stipulation for an extension of time to file
 3 MGM's responsive pleading.

4 Good cause exists to enlarge the time for MGM to respond to the Complaint.
 5 Between September 21 and November 8, 2023, eleven other related actions were filed
 6 against MGM in this and two other federal courts (the "Related Actions"). *See Owens v.*
 7 *MGM Resorts Int'l*, No. 2:23-cv-01480 (D. Nev.); *Kirwan v. MGM Resorts Int'l*, No. 2:23-
 8 cv-01481 (D. Nev.); *Zussman v. VICI Properties I LLC, et al.*, No. 2:23-cv-01537 (D. Nev.);
 9 *Lackey v. MGM Resorts Int'l*, No. 2:23-cv-01549 (D. Nev.); *Pircio v. MGM Resorts Int'l*,
 10 No. 2:23-cv-01550 (D. Nev.); *Rundell v. MGM Resorts Int'l*, No. 2:23-cv-01698 (D. Nev.);
 11 *Bezak v. MGM Resorts Int'l*, No. 2:23-cv-01719 (D. Nev.); *Zari v. MGM Resorts Int'l*, No.
 12 2:23-cv-01777 (D. Nev.); *Manson v. MGM Resorts Int'l*, No. 2:23-cv-01826 (D. Nev.);
 13 *Albrigo v. MGM Resorts Int'l*, No. 3:23-cv-01797 (S.D. Cal.); *Lassoff v. MGM Resorts Int'l*,
 14 *et al.*, No. 1:23-cv-20419 (D.N.J.).

15 MGM's counsel was only recently retained and requires additional time to review,
 16 investigate, and analyze the allegations in both the Complaint and the Related Actions.
 17 Moreover, based on the Parties' current understanding of the claims, there are significant
 18 overlaps between this action and the Related Actions. As such, additional time is required to
 19 permit time to meet and confer with the various parties to the Related Actions, evaluate the
 20 potential consolidation of the cases, and conserve judicial resources.

21 The Parties' request is made in good faith to enable MGM to complete an
 22 investigation into Plaintiff's claims. Moreover, this case is in its infancy, and this request
 23 will not prejudice any party.

24 **WHEREAS** the Parties respectfully request that MGM shall have until December
 25 12, 2023 to answer, move, or otherwise respond to the Complaint.

1 Dated: November 13, 2023

Respectfully submitted,

2
3 /s/ Rachele R. Byrd
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10 *MGM Resorts International*

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12
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14
15 IT IS SO ORDERED.

16 

17
18 Cam Ferenbach
19 United States Magistrate Judge

20 DATED 11-14-2023